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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8
9 UNITED STATES OF AMERICA,
10 Plaintiff,
11 v.
12 TORI MANGUM,
13 Defendant.

Case No. 2:22-cr-50-APG-MDC

**STIPULATION TO CONTINUE
SENTENCING**
(Fourth Request)

14
15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United
16 States Attorney, and David Kiebler, Assistant United States Attorney, counsel for the United
17 States of America, and Yi Lin Zheng, counsel for Tori Mangum, that the sentencing set for June
18 24, 2025, be vacated and set to a date and time convenient to this Court, but no sooner than
19 seventy five (75) days.

20 The Stipulation is entered into for the following reasons:

- 21 1. The United States Probation Department has provided a final draft revised PSR.
22 Defense counsel needs additional time to review the recommended guidelines and file informal
23 objections.
24 2. The defendant is in custody and does not object to the continuance.
25 3. The parties agree to the continuance.
26

1 4. The additional time requested herein is not sought for purposes of delay, but
2 merely to allow counsel for defendant sufficient time within which to be able to effectively and
3 complete investigation of the discovery materials provided.

4 This is the fourth stipulation to continue filed herein.

5 DATED: May 26, 2025.

6 By /s/ Yi Lin Zheng
7 Yi Lin Zheng
 Counsel for Tori Mangum

 Signal Chattah
 United States Attorney

8 By /s/ David Kiebler
9 David Kiebler
10 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

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FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

9
10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. The United States Probation Department has provided a final draft revised PSR.
14 Defense counsel needs additional time to review the recommended guidelines and file informal
15 objections.

16 2. The defendant is in custody and does not object to the continuance.

17 3. The parties agree to the continuance.

18 4. The parties agree to the continuance.

19 5. The additional time requested herein is not sought for purposes of delay, but
20 merely to allow counsel for defendant sufficient time within which to be able to effectively and
21 complete investigation of the discovery materials provided.

22 6. Additionally, denial of this request for continuance could result in a miscarriage
23 of justice. The additional time requested by this Stipulation is excludable in computing the time
24 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
25 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
26 Section 3161(h)(7)(B)(i), (iv).

CONCLUSIONS OF LAW

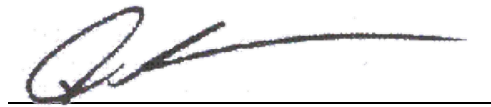
The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18, United States Code, § 3161(h)(7)(B)(i), (iv).

ORDER

IT IS FURTHER ORDERED that sentencing is continued to: September 17, 2025,
at 9:30 a.m. in LV Courtroom 6C.

DATED: May 30, 2025.

A handwritten signature in dark ink, appearing to read 'A. Gordon', is written over a horizontal line.

ANDREW P. GORDON
CHIEF U.S. DISTRICT JUDGE